However, almost all student publications receive some indirect form of subsidy from their school (office space or use of school-owned equipment and services, for example) that could implicate their rights under the Seventh Circuit's decision.

For more than three decades, student journalists at public colleges and universities have enjoyed the full legal protections of the First Amendment. Following this Court's lead, lower courts have held consistently that any attempt by school officials to censor or control constitutionally protected expression in a university student publication is prohibited even if that publication is sponsored by the school and part of a school-recognized activity. *See Rosenberger*, 515 U.S. 819; *Kincaid v. Gibson*, 236 F.3d 342 (6th Cir. 2001) (*en banc*); *Antonelli v. Hammond*, 308 F. Supp. 1329 (D. Mass. 1970); *Bazaar v. Fortune*, 489 F.2d 225 (5th Cir. 1973), *affirming en banc*, 476 F.2d 570 (5th Cir. 1973), *cert. denied*, 416 U.S. 1995 (1974); *Joyner v. Whiting*, 477 F.2d 456 (4th Cir. 1973); *Stanley v. Magrath*, 719 F.2d 279 (8th Cir. 1983); *Schiff v. Williams*, 519 F.2d 257 (5th Cir. 1975); *Mississippi Gay Alliance v. Goudelock*, 536 F.2d 1073 (5th Cir. 1973), *cert. denied*, 430 U.S. 982 (1977); *Bazaar v. Fortune*, 476 F.2d 570, *aff'd en banc*, 489 F.2d 225 (5th Cir. 1973) (per curiam), *cert. denied*, 416 U.S. 995 (1974); *Lueth v. St. Clair County Community College*, 732 F. Supp. 1410 (E.D. Mich. 1990); *Sinn v. Daily Nebraskan*, 638 F. Supp. 143, 148 (D. Neb. 1986) *aff'd*, 829 F.2d 662 (8th Cir. 1987); *Milliner v. Turner*, 436 So. 2d 1300 (La. Ct. App. 1983), *cert. denied*, 442 So. 2d 453 (La. 1983); *Mazart v. State*, 441

Media Operations (2005), L. Kopenhaver and R. Spielberger [to be published in *College Media Review* (Summer 2005), which is not yet available.] A 2001 version of this survey reported similar findings. L. Kopenhaver and R. Spielberger, *College Media Review*, at 4-11 (Winter 2002).

N.Y.S.2d 600, 605 (N.Y. Ct. Cl. 1981); *Panarella v. Birenbaum*, 32 N.Y.2d 108, 343 N.Y.S.2d 333 (N.Y. 1973); *State Board for Community Colleges v. Olson*, 687 P.2d 429 (Colo. 1984). The Seventh Circuit's decision is in direct conflict with law that has long been regarded as settled. The ruling will have far-reaching consequences for student and faculty speech on college and university campuses within its jurisdiction and beyond.

I. A First Amendment standard specifically created for high school student curricular expression is not appropriate for college and university students.

This Court's decision in *Hazelwood School Dist. v. Kuhlmeier*, 484 U.S. 260 (1988), established a restrictive standard for student First Amendment rights — applicable only in elementary and secondary schools — that was intended to help school officials protect students while they were children. *Id.* at 272 (noting that school officials must be able to take into account the "emotional maturity of the intended audience" in determining whether censorship of student speech is appropriate.) As adults,[8] however, college and university students are entitled to the protection afforded other adults under the First Amendment.

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[8] According to a U.S. Census Bureau survey, only 1 percent of those enrolled in American colleges or universities during the Fall of 2000 were under the age of 18. Fifty-five percent of those enrolled were 22 years of age or older. The full survey is available at: http://chronicle.com/weekly/almanac/2001/nation/0102001.htm.

A. This country's intellectual legacy exemplifies the fundamental role the First Amendment has played in preserving the "marketplace of ideas" in our college campuses.

The University is the paradigmatic "marketplace of ideas," rendering "the vigilant protection of constitutional freedoms...nowhere more vital than in the community of American schools." *Healy v. James*, 408 U.S. 169, 180 (1972) (citation omitted). This Court has specifically recognized there is "no doubt that the First Amendment rights of speech and association extend to the campuses of state universities." *Widmar v. Vincent*, 454 U.S. 263, 268-69.

This Court's restrictive First Amendment standard in *Hazelwood* sprung from the premise that the special circumstances of the secondary and elementary school environment permit school authorities to exercise more control over school-sponsored student expression than the First Amendment would otherwise permit. However, the judicial deference necessary in the high school setting and below – and in the factual context of *Hazelwood* – is inappropriate for a university setting. A high school is an entirely different environment from a university. This Court acknowledged such a difference when it explicitly reserved the question of whether the same level of deference to school officials expressed in *Hazelwood* would be "appropriate with respect to school-sponsored expressive activity at the college and university level." *Hazelwood, Id.* at 273, n.7. In fact, every effort to justify censorship of college student media under *Hazelwood* has been rejected by the lower courts except by the Seventh Circuit in *Hosty*. As Justice Souter has noted, the "cases dealing with the right of teaching institutions to limit expressive freedom of students have been

confined to high schools, whose students and their school's relation to them are different and at least arguably distinguishable from their counterparts in college education." *Board of Regents of the Univ. of Wisconsin System v. Southworth,* 529 U.S. 217 (2000) (Souter, J., concurring in the judgment) (citations omitted).

This Court has explicitly recognized that where the "vital" principles of the First Amendment are at stake, "the first danger to liberty lies in granting the State the power to examine publications to determine whether or not they are based on some ultimate idea and, if so, for the State to classify them. The second, and corollary, danger to speech is from the chilling of individual thought and expression." *Rosenberger v. Rectors and Visitors of the University of Virginia,* 515 U.S. 819, 835-36 (1995). These dangers are especially threatening in the university setting, where "[t]he quality and creative power of student intellectual life to this day remains a vital measure of a school's influence and attainment." *Id.* Yet that right to review and censor a student publication is precisely what the Seventh Circuit has approved in *Hosty.*

Such restrictions have no place at a public college or university. "For the University, by regulation, to cast disapproval on particular viewpoints of its students risks the suppression of free speech and creative inquiry in one of the vital centers for the Nation's intellectual life." *Id.* Lower courts have consistently struck down administrative attempts to limit free and robust student expression at the postsecondary level. *Joyner v. Whiting,* 477 F.2d 456 (4th Cir. 1973) (university withdrawal of funding to student publication at North Carolina State University based on editorial condemning integration rejected); *Stanley v. Magrath,* 719 F.2d 279 (8th Cir. 1983) (attempt by

University of Minnesota to change student newspaper funding mechanism after publication of controversial humor issue rejected); *Bazaar v. Fortune*, 476 F.2d 570 (5th Cir. 1973), *aff'd with modification*, 489 F.2d 255 (*en banc per curiam*) (University of Mississippi's censorship of student magazine because of "coarse language" and story about interracial love affair rejected). In fact, two appellate courts have explicitly refused to apply *Hazelwood* to college student media. *Student Government Association v. Board of Trustees of the University of Massachusetts*, 868 F. 2d 473, 480 n. 6 (1st Cir. 1989); *Kincaid v. Gibson*, 236 F.3d 342, 346 n. 4-5 (6th Cir. 2001) (en banc).

College student expression should be subject to no greater restrictions than those applicable to the public at large. *Healy*, 408 U.S. at 180. The driving force prompting the enactment of the First Amendment was the founders' unwavering commitment to the freedom of the mind. Nowhere is the mind more provoked, more nurtured, more challenged to new levels of enlightenment than on the university campus. *Hazelwood* did not, and should not be interpreted to have taken these fundamental precepts of college education into account when it diluted high school students' First Amendment rights. Nothing in *Hazelwood* or its progeny should be read to alter the venerated balance favoring free and independent thought on America's college and university campuses.

B. Extension of *Hazelwood*'s standard to college student media would have disastrous consequences.

1. The *Hazelwood* standard is vague and difficult to apply outside the specific factual context in which it arose.

Hazelwood is *sui generis.* Prior to 1988, the standard enunciated in *Tinker v. Des Moines Independent Community School District,* 393 U.S. 503, 513 (1969) (holding that school officials can only censor student expression when they can reasonably forecast a material and substantial disruption of school activities or an invasion of the rights of others) had uniformly been applied to censorship of all student expression at high schools. *See, e.g., Nicholson v. Board of Education,* 682 F.2d 858, 863 n.3 (9th Cir. 1982); *Gambino v. Fairfax County School Board,* 479 F. Supp. 731, 736 *aff'd,* 564 F.2d 157 (4th Cir. 1977) (citing 4th Cir. decisions that rely explicitly on *Tinker*); *Trachtman v. Anker,* 563 F.2d 512, 516 (2nd Cir. 1977), *cert. denied,* 435 U.S. 925 (1978); *Zucker v. Panitz,* 299 F. Supp. 102, 105 (S.D.N.Y. 1969). In *Hazelwood,* however, the Court upheld the decision of a high school principal to censor a high school student newspaper because: (1) the paper was produced by a journalism class and had not been opened by the school as a public forum for student expression; (2) as a nonpublic forum, *Tinker* was inapplicable; rather school officials would be allowed to censor such student speech if their actions were "reasonably related to legitimate pedagogical concerns," *Hazelwood,* 484 U.S. at 273, and (3) the principal's decision to prevent the publication of the articles was reasonably related to legitimate pedagogical concerns. The *Hazelwood* Court found it key that the student

speech at issue occurred in a school-sponsored student newspaper produced as part of a journalism class. It was also significant, the majority found, that the newspaper contained material that might be viewed as being endorsed by the school. Such factors, the Court said, permitted high school officials to exercise greater control over student expression than would be permitted under the more protective *Tinker* standard, which the Court concluded applied only to non-school-sponsored, independent student speech or speech in a designated public forum.

Hazelwood drastically shifted the balance. Where the First Amendment once required school officials to show that student speech was materially and substantially disruptive to normal school activities — or otherwise unlawful — *Hazelwood*, where it applied, now permitted a high school official to censor student speech that he or she deemed to be, for example, "poorly written," "biased or prejudiced," or thought to advocate "conduct otherwise inconsistent with 'the shared values of a civilized social order.'" *Hazelwood*, 484 U.S. at 271-272.

By any measure, the *Hazelwood* decision has given high school and elementary school officials far greater authority to censor the otherwise lawful speech of private citizens than is extended to any other group of government officials, except perhaps prison wardens. *See e.g., In re Williams*, 205 Cal. Rptr. 903 (Cal. App. 1984) (state may censor prison newspapers where prison officials can demonstrate actions achieve "legitimate penological objective.")

Courts continue to point to the expansive authority of *Hazelwood* in upholding administrative censorship of high school student and faculty speech in surprising ways and a

variety of contexts. *Phillips v. Oxford Separate Mun. School Dist.*, 314 F.Supp.2d 643 (N.D.Miss. 2003) (censorship of religious-oriented student government campaign poster); *Brandt ex rel. Brandt v. Board of Educ. of City of Chicago*, 326 F.Supp.2d 916, 921 (N.D. Ill. 2004) (ban on individual student T-shirts allowed where school officials can demonstrate ban is "reasonably related to legitimate pedagogical concerns"); *Bannon v. School Dist. of Palm Beach County*, 387 F.3d 1208 (11th Cir. 2004) (censorship of student murals containing religious words and phrases); *Fleming v. Jefferson County School Dist. R-1*, 298 F.3d 918 (10th Cir. 2002), *cert. denied*, 537 U.S. 1110 (2003) (censorship of student-designed wall tiles with religious themes); *Walz ex rel. Walz v. Egg Harbor Tp. Bd. of Educ.*, 342 F.3d 271 (3rd Cir. 2003), *cert. denied*, 541 U.S. 936 (2004) (censorship of pencils and candy canes handed out to kindergarten classmates with religious message attached); *Boring v. Buncombe County Bd. of Educ.*, 136 F.3d 364, 370 (4th Cir. 1998) (en banc), *cert. denied*, 525 U.S. 813 (1998) (upholding transfer of high school drama teacher after selecting controversial play for drama competition).

While some have argued that *Hazelwood* is best explained "in terms of the school's power to control its communicative resources [when these resources are a part of the official school curriculum], rather than as a power to regulate students' speech," William G. Buss, *School Newspapers, Public Forum, and the First Amendment*, 74 Iowa L. Rev. 505, 513 (1989), seventeen years of living with *Hazelwood* have shown that school officials and other state actors have not read the decision so narrowly, using it to justify the regulation of virtually any form of teacher and student speech.

Lower courts, too, have had great difficulty determining what, exactly, the *Hazelwood* standard is and how to apply it. This difficulty is exemplified by the New Jersey Supreme Court's decision in *Desilets v. Clearview Regional Board of Education*, 647 A.2d 150, 154 (N.J. 1994). In that case, the trial court summarily held that a junior high school principal's censorship of two movie reviews from a student newspaper was reasonably related to a legitimate pedagogical concern under *Hazelwood*. The appellate court reversed this portion of the trial court's holding and the New Jersey Supreme Court affirmed the appellate court. Although the high court agreed the movie reviews "[did] not appear to raise educational concerns that call for the kinds of editorial control exemplified by the Supreme Court in *Hazelwood*," it was unsure what exactly the *Hazelwood* standard meant. *Id.* at 154. The court noted the "inherent complexity surrounding the nature and scope of educational policy affecting expressional activity" and wished for guidance from the state educational agency. *Id.* *See also*, Martha M. McCarthy, *Post Hazelwood Developments: A Threat To Free Inquiry In Public Schools*, 81 Ed. Law. Rep. 3, 689 (June 1993) and cases cited therein.

2. There has been an increase in censorship of high school student journalism after *Hazelwood*.

Following *Hazelwood*, some commentators warned of the censorship "tsunami" that was likely to follow.[9] That prediction has not been far off. One result of the *Hazelwood*

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[9] J. Marc Abrams and S. Mark Goodman, Comment, *End of an Era? The Decline of Student Press Rights in the Wake of Hazelwood School District v. Kuhlmeier*, 1988 Duke L.J. 706, 728.

decision, for example, has been a sharp rise in high school censorship incidents reported to the Student Press Law Center (SPLC), a non-profit group that provides help and information to American high school and college student media. By the end of 2003, for example, calls to the SPLC from student journalists and their advisers seeking legal help had risen 331 percent since the court's 1988 ruling.[10] Although *Hazelwood* requires that school officials who choose to censor must provide a valid educational reason for their censorship, calls to the SPLC show many administrators have apparently interpreted the decision as providing them with an unlimited license to censor anything they choose. For example:

- In New York, a principal censored an accurate story from the student newspaper after it reported there were only two working bathrooms in a high school of 3,600 students.[11]

- In Indiana, a principal censored a story that painstakingly detailed how the girls' tennis coach had improperly pocketed more than $1,000 that team members had paid for court time. All agreed the story was accurate.[12]

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[10] The Student Press Law Center legal staff received 548 calls for legal help in 1988. By 2003, that number had risen to 2,360.

[11] *High School Confidential*, Brills Content, June 2001, p. 118-119.

[12] *See Death by Cheeseburger: High School Journalism in the 1990's and Beyond*, Freedom Forum (Arlington, Va.), 1994, pp. 113-15.

Examples such as these, and *many* others like them,[13] reveal that public high school officials have often relied on *Hazelwood* to censor student speech with relative impunity. In such cases, a student publication ceases to be a tool for teaching journalism or an exercise in democracy and becomes merely a public relations tool of the administration. When censorship can be justified by public school officials simply by their claiming a story is "poorly written," "biased," "inconsistent with the shared values of a civilized social order" or that they have some other weakly defined "legitimate pedagogical concern," the shield of the First Amendment is but a sieve.

Maintaining the college campus as a true marketplace of ideas demands that *Hazelwood* be limited to its own facts and not extended to the university setting. As one court has stated:

> "[B]ecause *Hazelwood* opens the door to significant curtailment of cherished First Amendment rights, this court declines to read the decision with the breadth its dictum invites. Because educators may limit student expression in the name of pedagogy, courts must avoid enlarging the venues within which that rationale may legitimately obtain without a clear and precise directive."

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[13] *See, e.g.*, Kaplan, J., *Hazelwood decision continues to haunt high school journalists*, Editor and Publisher, May 7, 1994, p. 48. See also, the Student Press Law Center Web site (http://www.splc.org), which includes hundreds of examples of student media censorship occurring at schools across the country.

Romano v. Harrington, 725 F. Supp. 687, 689 (E.D.N.Y. 1989).

3. Some of the best reporting being produced by college journalists today could be subject to censorship under *Hazelwood*.

In contrast to many high school censorship incidents, public college administrators today are less likely to be successful in their efforts to restrict the student press. This is usually (and perhaps only) because of the First Amendment protections that courts have consistently accorded college journalists. That circumstance would surely change were *Hazelwood* extended to limit the rights of college student journalists. Among some of the stories in college student publications that could be subject to censorship under the *Hazelwood* standard:

- An opinion piece opposing an upcoming referendum that would have provided the college with revenue collected from property taxes. University officials, claiming the paper contained typographical and grammatical errors, confiscated and destroyed 10,000 copies of the paper. After students threatened legal action, the school agreed to reprint the newspaper.[14]

- An article detailing the incoming university president's expenditure of state funds, including more than $100,000 spent to remodel the president's home and pay for

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[14] Miami-Dade Community College (FL) *Catalyst*, July 22, 1992 (as reported in the Student Press Law Center Report, Winter 1992-93, at 34).

his inauguration. Following publication, the president transferred the newspaper's adviser to another position at the school, an act that generated considerable public attention. The president later resigned after being questioned by state legislators regarding the spending that had been reported in the student newspaper. The adviser was reinstated.[15]

• A yearbook story reporting that members of the school's volleyball team were removed for bringing alcohol on a team trip and a feature spread on sex and relationships. Following publication, the yearbook editor lost his job. After the editor sued, the school agreed to a settlement in which it paid the editor $10,000 and agreed to a publications policy that prohibited administrative interference with the content of student publications.[16]

• An editorial cartoon, featuring cartoon figures as university officials, commenting on a U.S. Department of Education report that found the school had misused public funds when it paid for a trip to Disney World by students and school officials. One of those portrayed, the vice president of student affairs, temporarily halted printing of the issue — but released them after students objected.[17]

If *Hazelwood* is allowed to determine the level of First Amendment protection to which America's college student media are entitled, there is no doubt university administrators are poised to take advantage of their new

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[15] Northern Illinois University, *Northern Star*, June 1985 (as reported in the Student Press Law Center Report, Fall 1987, at 24).

[16] University of Southwestern Louisiana, *L'Acadien*, (1991), at 12, 219 (as reported in Student Press Law Center Report, Fall 1994, at 29).

[17] West Virginia State University *The Yellow Jacket*, Jan. 27, 1994 (as reported in the Student Press Law Center *Report*, Spring 1994, at 25).

censorship powers. Word has already begun to spread that the standard "hands-off student media" policies recognized by college officials in the past may no longer be required. In California, for example — 2,000 miles west of the Governors State University campus and far beyond the jurisdiction of the Seventh Circuit — administrators at California State University system schools received a memo from the system's legal counsel on June 30, 2005 — ten days after the Seventh Circuit handed down its decision — informing them that "[*Hosty*] appears to signal that CSU campuses may have more latitude than previously believed to censor the content of subsidized student newspapers...."[18]

Extending *Hazelwood* to the university setting is a recipe for encouraging censorship that would dramatically hinder the production of good journalism and the training of good journalists. *Amici* do not believe this Court intended the censorship of college and university student newspapers to be the legacy of *Hazelwood*.

CONCLUSION

For the forgoing reasons, *Amici* respectfully request that the Petition of Margaret L. Hosty, Jeni S. Porsche, and Steven P. Barba for Writ of Certiorari be granted.

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[18] C. Helwick, Memorandum to CSU University Presidents (June 30, 2005); Student Press Law Center, *Memo linking California with Hosty decision worries students*, SPLC NewsFlash, September 15, 2005 (available online at: http://www.splc.org/newsflash.asp?id=1064&year.

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APPENDIX

Identification of the *Amici Curiae*

The Student Press Law Center, Associated Collegiate Press, College Media Advisers, Community College Journalism Association, Society for Collegiate Journalists, Reporters Committee for the Freedom of the Press, American Society of Newspaper Editors, National Newspaper Association, Newspaper Association of America, Society of Professional Journalists, Associated Press Managing Editors, College Newspaper Business and Advertising Managers, National Federation of Press Women, National Lesbian and Gay Journalists Association and the Campus Journalism Project include and represent every major national organization of college journalists and college media advisers as well as organizations representing professional journalists and the news organizations they work for, and thus have a particular interest in the ultimate resolution of this case.

The Student Press Law Center is a national, non-profit, non-partisan organization established in 1974 to perform legal research and provide information and advocacy for the purpose of promoting and preserving the free expression rights of student journalists. As the only national organization in the country devoted exclusively to defending the legal rights of the student press, the Center has collected information on student press cases nationwide and has submitted various amicus briefs, including to this Court and many federal courts of appeal.

The Associated Collegiate Press is a division of the National Scholastic Press Association, a 501(c)(3) non-profit association of student media groups at colleges, universities

and secondary schools throughout the United States and in several other countries. Founded in 1921, the college/ university division represents about 700 media organizations and more than 20,000 student journalists. The associations provide journalism education and recognition opportunities for their members, including reporting competitions and programs on press law and ethics.

College Media Advisers, with more than 750 members, has a 48-year history of representing the people who advise the nation's collegiate newspapers, yearbooks, magazines and electronic media. This organization endorses student press freedom as guaranteed by the First Amendment of the U.S. Constitution and has long held that a free an unencumbered student press serves the learning environment of an academic community far better than a student press which is restrained by prior review and censorship.

The Community College Journalism Association is an international organization that fosters the improvement of journalism instruction in higher education, especially in two-year institutions. Founded in 1968, CCJA is dedicated to the precept that community college journalism education must seek high standards in the preparation of men and women for effective careers in mass media.

The Society for Collegiate Journalists is the nation's oldest journalism honorary society for college students, founded in 1909 at Syracuse University. We subscribe to the Code of Ethics for the Society of Professional Journalists and encourage the free expression of editors and managers of collegiate media. Over the years SCJ and its predecessor organizations have represented more than 200 colleges and universities and tens of thousands of student and honorary members.

The Reporters Committee for Freedom of the Press is a voluntary, unincorporated association of reporters and editors that works to defend the First Amendment rights and freedom of information interests of the news media. The Reporters Committee has provided representation, guidance and research in First Amendment and Freedom of Information Act litigation since 1970.

The American Society of Newspaper Editors is a non-profit organization founded in 1922. It has a nationwide membership of approximately 850 persons who hold positions as directing editors of daily newspapers throughout the United States, with members recently being added in Canada and other countries in the Americas. The purposes of the Society include assisting journalists and providing an unfettered and effective press in the service of the American people.

The Newspaper Association of America (NAA) is a non-profit organization representing the interests of more than 2,000 newspapers in the United States and Canada. NAA members account for nearly 90 percent of the daily newspaper circulation in the United States and a wide range of non-daily newspapers. One of NAA's key strategic priorities is to advance newspapers' First Amendment interests, including the ability to gather and report the news.

The National Newspaper Association (NNA) is a 2,500-member organization representing community newspapers across the United States. Founded in 1885, it is the oldest national organization for newspapers. Its missions include a vigorous defense of First Amendment free press rights. NNA maintains offices in Columbia, Missouri and Arlington, Virginia.

The Society of Professional Journalists is the largest and most broad-based journalism organization in the United States, with a membership consisting of professional working journalists, college and university professors and student journalists. The Society is committed to encouraging the free practice of journalism, improving the quality of journalism and stimulating high standards of ethical behavior. Founded in 1909 as Sigma Delta Chi, SPJ promotes the free flow of information vital to a well-informed citizenry, works to inspire and educate the next generation of journalists and protects the guarantees of freedom of speech and press found in the First Amendment to the United States Constitution.

Associated Press Managing Editors was formed in 1933 as a national association for editors in the United States and Canada whose newspapers subscribe to the Associated Press. The organization provides oversight of AP's news coverage. It also provides guidance and counsel to editors and advocates on behalf of First Amendment principles. The latter is the source of our interest in this case.

College Newspaper Business and Advertising Managers is a national organization of college newspaper business staffs. Founded in 1972, CNBAM represents more than 120 student newspapers with a circulation of over 1.4 million and more than $50 million in annual sales. Their annual conference brings together students, professional staff members and industry experts to discuss advertising trends and exchange ideas. The organization also provides education opportunities and recognition to student sales staffs through their annual advertising contest.

The National Freedom of Press Women represents 1,500 women and men in various communications professions. Its purposes are to advance the communications professions, provide for exchange of ideas, knowledge and experiences in communications, and coordinate efforts of interest to women communications professionals. It offers regular education and professional development programs for journalists, including high school and college media advisers.

The National Lesbian and Gay Journalists Association (NLGJA) is a 501(c)(3) non-profit organization of 1,300 members in 24 chapters nationwide, with affiliations in Canada and Germany. Founded in 1990, NLGJA is an organization of journalists, media professionals, educators and students who work within the media industry to foster fair and accurate coverage of lesbian, gay, bisexual and transgender issues. NLGJA provides professional development to its members and opposes all forms of workplace bias.

The Independent Press Association is a nonprofit media reform organization, with more than 500 member publications, that seeks to amplify the power of the independent press in order to foster a more just, open, and democratic society. Its Campus Journalism Project trains students to create and improve independent media, and has helped students defend freedom of the college press since 1995.